

(Caption of Case)

In re: Application of Chem-Nuclear Systems, LLC,
for Adjustment in Levels of Allowable Costs and for
Identification of Allowable Costs (FY 2008-2009)

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2000 - 366 - A

(Please type or print)

Submitted by: Robert T. Bockman, EsquireSC Bar Number: 000747Address: McNair Law Firm, P.A.Telephone: (803) 799-980Post Office Box 11390Fax: (803) 732-321Columbia, South Carolina 29211

Other: _____

Email: bbockman@mcnair.net

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input checked="" type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input checked="" type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

Robert T. Bockman

May 15, 2009

bbockman@mcnair.net
T (803) 799-9800
F (803) 753-3219

Hand Delivered

The Honorable Charles L.A. Terreni
Chief Clerk and Administrator
South Carolina Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211

RE: Application of Chem-Nuclear Systems, LLC, a Division of Duratek,
Inc. (SCPSC Docket No. 2000-366-A) (FY 2008-2009 Proceeding)

RECEIVED
2009 MAY 15 PM 3:56
SOUTH CAROLINA
PUBLIC SERVICE
COMMISSION

Dear Mr. Terreni:

Please find enclosed fifteen (15) copies of a joint proposed Order Identifying Allowable Costs in this proceeding, which I am submitting on behalf of Chem-Nuclear Systems, LLC, a Division of Duratek, Inc., and for the Office of Regulatory Staff which joins in the filing of the proposed Order. Please file the joint Proposed Order in accordance with the Commission's rules and regulations.

By copy of this letter, I am providing a copy of the joint Proposed Order to each party of record. If you have any questions with respect to this matter, please do not hesitate to contact me.

Very truly yours,



Robert T. Bockman

cc: Len S. Anthony, Esquire (w/encl.)
Mr. Dan F. Arnett (w/encl.)
K. Chad Burgess, Esquire (w/encl.)
Frank R. Ellerbe, III, Esquire (w/encl.)
Catherine E. Heigel, Esquire (w/encl.)
The Honorable C. Earl Hunter, (w/encl.)
The Honorable Henry D. McMaster (w/encl.)
Derrick K. McFarland, Esquire (w/encl.)
Jeff M. Nelson, Esquire (w/encl.)

McNair Law Firm, P. A.
The Tower at 1301 Gervais
1301 Gervais Street
11th Floor
Columbia, SC 29201

Mailing Address
Post Office Box 11390
Columbia, SC 29211

mcnair.net

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2000-366-A - Order No. 2009-_____

May _____, 2009

In re: Application of Chem-Nuclear Systems, LLC,)
 a Division of Duratek, Inc., for Application)
 for Adjustment in the Levels of Allowable)
 Costs and for Identification of Allowable)
 Costs (FY 2008-2009 Proceeding))
_____)

**ORDER IDENTIFYING
ALLOWABLE COSTS**

I. INTRODUCTION

This matter comes before the Public Service Commission of South Carolina (the “Commission”) by way of the Application of Chem-Nuclear Systems, LLC, a subsidiary of Duratek, Inc. (“Chem-Nuclear” or the “Company”), dated September 30, 2008 (the “Original Application”). By its Original Application, Chem-Nuclear sought an adjustment in the levels of certain allowable costs for Fiscal Year 2007-2008, which the Commission had previously identified, and for the identification of allowable costs for Fiscal Year 2008-2009 associated with the operation of the Company’s regional low-level radioactive waste disposal facility located in the vicinity of Barnwell, South Carolina (the “Barnwell Facility”). The Application was submitted pursuant to the pertinent provisions of the Atlantic Interstate Low-level Radioactive Waste Compact Implementation Act (the “Act”), which is codified as S.C. Code Ann. §§ 48-46-10, et. seq. (1976), as amended. On February 6, 2009, the Company filed and served an Amended Application which proposed certain revisions in the information contained in the Original Application to reflect the Company’s reconciliation of certain issues with the Office of Regulatory Staff (“ORS”).

The Act established a comprehensive economic regulatory program and governs the relationship between the State of South Carolina and operators of facilities for the disposal of low-level radioactive waste. Among other things, the Act provides for South Carolina's membership in the Atlantic Low-level Radioactive Waste Compact (the "Compact") and authorizes the manner in which this State participates in the Compact with Connecticut and New Jersey, the other member states. S.C. Code Ann. § 48-46-20 (Supp. 2008).

The Act fixes a schedule of annually declining maximum volumes of low-level radioactive waste that a disposal facility in South Carolina may accept from generators within and without the Compact's member States. S.C. Code Ann. § 48-46-40(A)(6)(a) (Supp. 2008). In addition, the Act empowers the South Carolina Budget and Control Board (the "Budget and Control Board") to fix the rates that an operator of a disposal facility in South Carolina may charge a generator for disposal of the generator's low-level radioactive waste. The Act fixes fees for various purposes and provides for the disposition of revenues produced by the disposal operations of facilities subject to the Act. Chem-Nuclear operates the only disposal facility for low-level radioactive waste in South Carolina.

Under the Act, the Commission has the responsibility to identify the "allowable costs" of a disposal facility operator. S.C. Code Ann. § 48-46-40(B)(1) (Supp. 2008). "Allowable costs" are "costs to a disposal site operator of operating a regional disposal facility, and they "are limited to costs determined by standard accounting practices and regulatory findings to be associated with facility operations." S.C. Code Ann. § 48-46-30(I) (Supp. 2008). The Act provides that "allowable costs" expressly include the costs of certain specifically identified activities necessary in the operation of a low-level radioactive waste facility. S.C. Code Ann. § 48-46-40(B)(3)(a) through (n) (Supp. 2008). Section 48-46-40(3) also provides that "allowable

costs” include “any other costs directly associated with disposal operations determined by [the Commission] to be allowable.” The Act excludes from identification as “allowable costs” the costs of certain expressly listed activities and “any other costs determined by [the Commission] to be unallowable.” S.C. Code Ann. § 48-46-40(B)(3) (Supp. 2008).

The Act entitles a disposal facility operator to recover an operating margin of twenty-nine (29%), which is applied to identified “allowable costs,” excluding certain “allowable costs” for taxes and the licensing and permitting fees which the operator is required to remit to governmental entities. S.C. Code Ann. § 48-46-40(B)(5) (Supp. 2008).

The level of “allowable costs” and the statutory operating margin affect the amount of annual revenue that a disposal facility operator remits to the State of South Carolina. At the end of the fiscal year, the operator pays the South Carolina Department of Revenue an amount equal to the total revenue the operator had received for waste disposal services during the fiscal year reduced by the operator’s identified “allowable costs,” and reduced further by the 29% statutory operating margin on the “allowable costs” under the Act, and reduced further by payments that the operator made during the fiscal year for reimbursement of certain administrative costs which the Budget and Control Board, the Commission, the State Treasurer and the Atlantic Compact Commission (the “Compact Commission”) have incurred for the conduct of those agencies’ responsibilities in administering the Act. S.C. Code Ann. § 48-46-60(B) and (C) (Supp. 2008).

The Act provides that the operator of a low-level radioactive waste disposal site may apply to the Commission for adjustments in the levels of “allowable costs” which the Commission had identified for the previous fiscal year and for identification of costs which the Commission had not previously identified as “allowable costs.” S.C. Code Ann. § 48-46-40(B)(4) (Supp. 2008). Upon disposition of the issues in an application, the Act requires the Commission to authorize the site operator to adjust its “allowable costs” for the current fiscal

year to compensate the site operator for revenues “lost” during the previous fiscal year (that is, the difference between the level of “allowable costs” previously identified and the level of “allowable costs” identified upon approval of the application). Id.

Chem-Nuclear filed its Original and Amended Applications in this proceeding seeking to be compensated for the difference between the level of “allowable costs,” which we identified in Order No. 2008-447 and the amount of such costs that the Company actually experienced in the Fiscal Year 2007-2008 and for identification of Chem-Nuclear’s “allowable costs” for Fiscal Year 2008-2009. As in prior proceedings, Chem-Nuclear applied to be compensated only for those “allowable costs” incurred in Fiscal Year 2007-2008 where the actual costs were more than those identified and approved in Order No. 2008-447. Amended Application at paragraphs 11-14 and Exhibit A to the Amended Application.

This case represents the ninth annual proceeding in this Docket in which the Commission has considered the identification of “allowable costs” for Chem-Nuclear under the provisions of the Act. See Order No. 2001-499, dated June 1, 2001; Order No. 2002-395, dated June 3, 2002; Order No. 2003-188, dated April 14, 2003; Order No. 2004-349, dated July 23, 2004; Order No. 2005-338(A), dated June 27, 2005; Order No. 2006-328, dated May 30, 2006; Order No. 2007-418, dated June 7, 2007; and Order No. 2008-447, dated June 17, 2008.

Upon receipt of the Company’s Original Application, the Commission’s Docketing Department directed Chem-Nuclear to publish a Notice of Filing, advising the public of the submission of the Original Application and of the manner in which interested persons might intervene or otherwise participate in this proceeding. Chem-Nuclear filed affidavits of publication which demonstrated its compliance with the instructions of the Docketing Department.

The Act specifies certain agencies to be parties of record in proceedings for identification of allowable costs before the Commission. Those parties are: the Budget and Control Board, the Executive Director of the ORS and the Attorney General for the State of South Carolina. S.C. Code Ann. § 48-46-40(B)(9) (Supp. 2008). In addition, the Compact Commission and the South Carolina Department of Health and Environmental Control (“DHEC”) have the discretion under the Act to participate as parties. *Id.* Pursuant to the provisions of S.C. Code Ann. § 58-4-10(B) (Supp. 2008), the ORS represents “the public interest” in proceedings in this Docket.

On April 28, 2009, the Commission held an evidentiary hearing with respect to the issues in the Company’s Amended Application. The Honorable Elizabeth B. “Lib” Fleming, Chairman, presided and Commissioners Clyburn, Hamilton, Mitchell, Whitfield and Wright were in attendance. Joseph Melchers, Esquire, served as Advisor to the Commission. Appearances were as follows: Robert T. Bockman, Esquire, represented Chem-Nuclear; Jeffrey M. Nelson, Esquire, represented the ORS; neither the Budget and Control Board nor DHEC appeared at the hearing. The Attorney General did not appear or participate in the hearing. Duke Energy Carolinas, LLC (“Duke”), and South Carolina Electric & Gas Company (SCE&G”), which had intervened in this Docket, were represented by Catherine E. Heigel, Esquire, and by K. Chad Burgess, Esquire, respectively. Frank R. Ellerbe, III, Esquire, represented the Compact Commission. Progress Energy Carolinas, Inc. (“Progress Energy”), did not appear at the hearing.

Chem-Nuclear and the ORS entered into a Settlement Agreement, dated March 24, 2009, by which they resolved various issues raised in the Amended Application and during the audit which ORS conducted. Counsel for SCE&G, Duke, Progress Energy and the Compact Commission signed the Settlement Agreement. The Settlement Agreement was filed with the

Commission prior to the hearing and is a part of the administrative record of this proceeding, as Hearing Exhibit No. 1. Tr. p. 7. The Settlement Agreement included an attachment which consisted of the audit report prepared by ORS of its examination of Chem-Nuclear's books and records. Chem-Nuclear presented the testimony of one (1) witness, James W. Latham. The record of this proceeding consists of the pleadings; the Commission's notices; the transcript of the oral testimony, consisting of sixty-eight (68) pages; and two (2) hearing exhibits.

II. DISCUSSION OF ISSUES

All of the issues relating to the identification of "allowable costs" for Fiscal Year 2007-2008 and for Fiscal Year 2008-2009 were resolved among the parties or were not contested in the evidence or positions of the parties. Consequently, the Commission will discuss the issues in general to reflect our reliance upon the evidentiary record for the findings and conclusions in this order.

A. "Allowable Costs" for Fiscal Year 2007-2008

In accordance with the provisions of the Collaborative Review of Chem-Nuclear's Operations and Efficiency Plan ("OEP"), which Order No. 2004-349 approved for use in these "allowable cost" proceedings, Chem-Nuclear's application and its evidence separated costs into three (3) categories: fixed costs, variable costs and irregular costs. Tr. pp. 27-28. As Order No. 2004-349 had recognized, the OEP was valid for use as a "baseline for establishing a method for identifying 'allowable costs.'" Order No. 2004-349, p. 17.

1. Fixed Costs for Fiscal Year 2007-2008

Chem-Nuclear separated its fixed costs for Fiscal Year 2007-2008 into several general categories: labor and fringe costs, non-labor costs, corporate allocation of general and administrative expense, equipment leases and support, depreciation, and insurance, as well as

those fixed costs for which the statutory operating margin was not applicable. The operating expense for that period resulted in total fixed costs of \$7,452,850, which were actually incurred. Hearing Ex. No. 2, Amended Exhibit A, p. 1. Since the total fixed costs which Chem-Nuclear actually incurred for 2007-2008 were less than the level of fixed costs anticipated in Order No. 2008-447, the Company did not propose any adjustment in the previously identified allowable fixed costs for Fiscal Year 2007-2008. Tr. p. 14. The record supports the identification of \$7,452,850 as fixed “allowable costs” for Fiscal Year 2007-2008.

2. Variable Material Costs for Vaults for Fiscal Year 2007-2008

The actual costs for vaults are predicated on a number of factors, including the size and shape of waste packages and the number and size of vaults required for disposal. Tr. pp. 30-31. For Fiscal Year 2007-2008, Chem-Nuclear’s actual costs for disposal vaults were \$1,975,945. Hearing Ex. No. 2, Amended Exhibit A, p. 3.

3. Variable Labor Costs and Non-Labor Costs for Fiscal Year 2007-2008

Order No. 2008-447 determined various categories of rates applicable to the following: purchase, inspection, and placement of disposal vaults, handling of the various classes of waste shipments, slit trench offload operations, customer assistance, and scheduling of waste shipments and maintenance of disposal records. Tr. pp. 34-35. Hearing Ex. No. 2, Amended Exhibit A, p. 2. According to the record, the variable Labor and Non-Labor rates are associated with several independent variables. The Company incurred actual variable labor and non-labor costs of \$1,195,903 in Fiscal Year 2007-2008, which the Company has requested to be included in this category of costs for Fiscal Year 2007-2008.

4. Irregular Costs for Fiscal Year 2007-2008

Irregular costs include costs for projects that are nonrecurring annually or varying costs for projects which continue for more than a year. Tr. p. 35. The record contains numerous

descriptions of each project and the actual costs that Chem-Nuclear incurred for them in Fiscal Year 2007-2008. Id., pp. 35-37. At the date of the issuance of Order No. 2008-447, not all of the irregular costs for Fiscal Year 2007-2008 were known and measurable. Id. p. 17. The evidence here establishes that Chem-Nuclear incurred actual irregular costs for Fiscal Year 2007-2008 of \$644,843. Tr. p. 35. Amended Exhibit A, p. 4.

B. Proposed “Allowable Costs” for Fiscal Year 2008-2009

Chem-Nuclear’s Amended Application and the evidence in the record presented “allowable costs” to be identified for Fiscal Year 2008-2009, separated into the three (3) cost categories that were submitted in the Collaborative Review of the OEP and adopted in Order No. 2004-349.

1. Allowable Fixed Costs for Fiscal Year 2008-2009

Chem-Nuclear proposed total fixed costs of \$2,561,000 to be identified as “allowable costs” for Fiscal Year 2008-2009. That amount was based on actual fixed costs incurred in Fiscal Year 2007-2008, with appropriate adjustments for inflation as the Commission has previously approved, and in anticipation of lower volumes for disposal. Tr. pp. 17-18 and 37-38. The total fixed costs for Fiscal Year 2008-2009 include \$25,000 to which the statutory operating margin is not applicable.

2. Allowable Irregular Costs for Fiscal Year 2008-2009

Chem-Nuclear described general categories of projects with estimated total costs of \$389,000, which it categorized as irregular costs for Fiscal Year 2008-2009. Tr. pp. 18-19 and 38-39.

3. Variable Material Cost (Vaults) Rates for Fiscal Year 2008-2009

For Fiscal Year 2008-2009, Chem-Nuclear proposed variable material cost rates for each

category of waste received based upon the rates which we had approved in Order No. 2008-447 for Fiscal Year 2007-2008, as adjusted for an increase in the costs of concrete disposal vaults from Chem-Nuclear's supplier. Tr. pp. 20 and 39-40.

4. Variable Labor and Non-Labor Rates for Fiscal Year 2008-2009

For Fiscal Year 2008-2009, Chem-Nuclear proposed rates for variable labor and non-labor costs. Tr. pp. 19-20 and 39. Amended Exhibit C. Those rates pertained to five (5) categories: vault purchase and inspection (per vault); ABC waste disposal (per shipment); Slit Trench Waste Operations (per offload); customer assistance (per shipment); and maintenance of trench records (per container). The rates were based on actual costs during the first seven (7) months of Fiscal Year 2008-2009. Tr. pp. 20 and 39.

III. FINDINGS AND CONCLUSIONS

1. The Public Service Commission of South Carolina is authorized and directed by S.C. Code Ann. §§ 48-46-40(B), et seq. (Supp. 2008) to identify allowable costs for Chem-Nuclear's operation of a regional low-level radioactive waste disposal facility in South Carolina. The facility is located in Barnwell, South Carolina.

2. Chem-Nuclear has operated the disposal site in question continuously since 1971 without interruptions. Undisputed amounts in Chem-Nuclear's accounts that will herein be identified and approved by this Commission as "allowable costs" for Fiscal Year 2007-2008 are included in Appendix A, which is attached to this Order.

3. Further, we approve and identify as "allowable costs" for Fiscal Year 2008-2009 the individual figures and the sum of \$2,950,000 in fixed and irregular costs, as reflected in Appendix B, which is attached to this Order.

4. Further, we approve the variable cost rates for Fiscal Year 2008-2009, as those costs and rates that are depicted in Appendix B, which is attached to this Order. The actual expense in the variable cost category will be dependent on the actual volumes and classes of waste received. The rates in Appendix B are appropriately documented in the record of this proceeding.

5. Chem-Nuclear shall continue to submit monthly reports of variable cost data to the Commission as required by Commission Order No. 2001-499.

6. This Order shall remain in full force and effect until further Order of the Commission.

BY ORDER OF THE COMMISSION:

Elizabeth B. Fleming, Chairman

ATTEST:

Charles Terreni, Chief Clerk and Administrator
(SEAL)

APPENDIX A – Order No. 2009-_____
Docket No. 2000-366-A
May ____, 2009
Page 1 of 2
Chem-Nuclear Systems, LLC
Allowable Costs
Fiscal Year Ending June 30, 2008

<u>Description</u>	<u>Allowable Cost</u>
Fixed Costs	
Fixed Labor and Fringe	\$2,452,543
Non-Labor Costs	\$1,087,714
Depreciation	\$188,000
Insurance	\$632,003
Equipment and Leases and Support	\$696,642
Corporate G&A	\$1,246,765
Intangible Asset Amortization (Operating Rights)*	\$624,917
Employee Retention Compensation*	\$461,905
Legal Support*	\$62,361
Total Fixed Costs	\$7,452,850.00
Variable Costs**	
Vault Costs	\$1,975,945
Variable Labor and Fringe	\$1,195,903
Total Variable Costs	\$3,171,848.00
Irregular Costs	
Total Irregular Costs (see page 2 of 2)	644,843
Total Allowable Costs	\$11,269,541

* Not subject to statutory operating margin.

** Categories of costs include: Vault Purchase and Inspection, ABC Waste Disposal, Slit Trench Operations, Waste Acceptance and Trench Records.

APPENDIX A – Order No. 2009-_____
Docket No. 2000-366-A
May ___, 2009
Page 2 of 2
Chem-Nuclear Systems, LLC
Allowable Costs
Fiscal Year Ending June 30, 2008

<u>Irregular Cost Item</u>	<u>Labor & Fringe</u>	<u>Non Labor</u>	<u>Total Cost</u>
Irregular Components	(\$36)	\$3,328	\$3,292
Various Trenches	\$53,662	\$232,235	\$285,897
Decontamination and Corrective Actions	\$8,569	\$62,112	\$70,681
Deep Well and Monitoring Well Abandonment	\$3,803	\$490	\$4,293
Site Engineering and Drawing Updates	\$15,465	\$9,051	\$24,516
Site Assessments	\$92,621	\$63,819	\$156,440
License Renewal and Appeal Costs	\$3,802	\$1,579	\$5,381
Investigation of Mary's Branch	\$24,383	0	\$24,383
Insured Security Controls	(\$38)	\$1,850	\$1,812
Other Irregular Costs	\$5,594	\$62,554	\$68,148
<u>Total Irregular Costs</u>	<u>\$207,825</u>	<u>\$437,018</u>	<u>\$644,843</u>

APPENDIX B – Order No. 2009-_____
Docket No. 2000-366-A _____
May ____, 2009
Page 1 of 1
Chem-Nuclear Systems, LLC
Allowable Costs
Fiscal Year Ending June 30, 2009

<u>Description</u>	<u>Allowable Cost</u>
Fixed Costs	
Labor and Fringe and Non-Labor	\$1,000,000
Depreciation	\$188,000
Insurance	\$448,000
Equipment Leases and Support	\$400,000
Corporate Allocation (Management Fee/G&A)	\$500,000
Legal Support*	\$25,000
	<hr/>
Total Fixed Costs	\$2,561,000
Irregular Costs	
Trench Construction	\$40,000
License Appeal	\$5,000
Increased Security Controls	\$10,000
Site Engineering Drawings	\$3,000
Site Assessments	\$30,000
Severance Pay	\$300,000
Miscellaneous	\$1,000
	<hr/>
Total Irregular Costs	\$389,000
	<hr/>
Total Fixed and Irregular Costs	<u>\$2,950,000</u>
Variable Costs	
<u>Variable Labor and Non-Labor Rates</u>	
Vault Purchase and Inspection (per vault)	\$75.91
ABC Waste Disposal (per shipment)	\$1,818.55
Slit Trench Shipment (Offload)	\$6,565.38
Customer Assistance (per shipment)	\$44.45
Trench Records (per container)	\$124.06
<u>Variable Material Costs (Vault Costs)</u>	
Class A Waste (per cubic foot)	\$38.26
Class B Waste (per cubic foot)	\$39.65
Class C Waste (per cubic foot)	\$40.49
Slit Trench Waste (per cubic foot)	\$180.92

* Not subject to statutory operating margin